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May 24, 2007

ELECTRONICALLY FILED

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Implementation of the Telecommunications Act of 1996-Telecommunications Carriers' Use of Customer Proprietary Network Information and other Customer Information, CC Docket No. 96-115

Dear Ms. Dortch:

Covad Communications takes this opportunity to express its concerns regarding any potential near-term Commission action to severely limit foreign access to CPNI generated in the United States.

Covad agrees with the views expressed by other interested parties in this proceeding that the current record on the issue is stale and should be refreshed prior to the Commission taking action that could be potentially very harmful to the industry and ultimately to consumers. Adopting restrictive rules based on an outdated record that does not reflect the significant evolution of the relevant markets in the past several years would clearly be harmful to international commerce and contrary to the public interest. For companies like Covad, onerous restrictions on foreign access to CPNI would potentially eliminate the option of utilizing international call centers for customer support and other important functions. Prohibiting the reasonable utilization of foreign call centers would significantly compromise providers' ability to compete and effectively meet their customers' needs.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter is being filed electronically in the above-captioned proceeding. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Angela Simpson', written over a horizontal line.

Angela Simpson
Director, Government Affairs
Covad Communications